


EXHIBIT “2”

 **Ram Dhan Yadav Kotamaraja** <ram.dhan@gmail.com>
to Jon, me, Raj ▾

Sounds good. I will work on it and send it back to you.

...

[Message clipped] [View entire message](#)

 **Ram Dhan Yadav Kotamaraja** <ram.dhan@gmail.com>
to Jon, me, Raj ▾

Jon,

I faxed it to you. Let me know if you got it.

On Thursday, January 26, 2012, Ram Dhan Yadav Kotamaraja <ram.dhan@gmail.com> wrote:

> Sounds good. I will work on it and send it back to you.

>

> On Thu, Jan 26, 2012 at 11:39 AM, Jon A. Haslett <jon.haslett@akulalaw.com> wrote:

>

> Dear Ram:

>

>

>

> Attached is your affidavit [REDACTED]

,

AFFIDAVIT OF RAMDHAN YADAV KOTAMARAJA

STATE OF MASSACHUSETTS §
 §
COUNTY OF MIDDLESEX §

ON THIS DATE, said Affiant personally appeared before me, the undersigned Notary Public, and after being duly sworn, stated the following under oath:

1. “My name is Ramdhan Yadav Kotamaraja. I am over fourteen (14) years of age and I am of sound mind. I have never been convicted of a crime and I am fully competent to make this affidavit. I have personal knowledge of each and every fact stated herein, and each and every fact stated herein is true and correct.
2. I am a director of Novedea Systems, Inc. (Novedea), a Texas corporation registered with the Texas Secretary of State. The corporate offices of Novedea are located at 1750 North Collins Boulevard, Suite 212, Richardson, Texas 75080.
3. Novedea was formed in May, 2005. Novedea’s business pursuit is to train and place workers at information technology (IT) companies throughout the United States, with an emphasis on placing workers who are primarily citizens of the United States or non-citizens of the United States who are citizens of India.
4. In addition to myself, there are three other directors of Novedea: Srihari Govindarajan (Govindarajan) Suresh Rajappa (Rajappa), and Ananda Babu Dasari (Dasari). I own 35 percent of the shares of Novedea, Govindarajan owns 39 percent of the shares, Rajappa owns 8.5 percent of the shares, and Dasari owns 17.5 percent of the shares.
5. In late 2009, Novedea was a modestly-profitable business, with gross monthly revenues of approximately \$25,000. However, the revenues of Novedea began to rapidly grow, and by 2011 Novedea had become a very profitable enterprise. Now gross monthly revenues average \$165,000.
6. I recently learned that in June 2011 Govindarajan and Rajappa formed another company, Intellisee Group, Inc. (Intellisee), which directly competes with Novedea in the IT industry. Govindarajan is the owner of Intellisee. The address for the corporate offices of Intellisee is 1200 West Walnut Hill Lane, Suite 3000, Irving, Texas 75038. I also learned that Govindarajan lured Rajappa away from Novedea to form Intellisee. Rajappa enticed a key trainer, Kishan Chandra Golla, away from Novedea to work at Intellisee. Rajappa did this under the guidance and approval of Govindarajan.
7. Further, I learned that Intellisee was contacting clients of Novedea to sell them services, in direct competition with Novedea. Moreover, Intellisee is using the accountant employed by Novedea, Christopher Palaparthi, as the accountant for Intellisee, which threatens the disclosure of Novedea’s confidential information to Intellisee.

8. On January 21, 2012, a meeting was held of the directors and shareholders of Novedea. The attendees were me, Govindarajan, Rajappa, and Dasari. Dasari and I confronted Govindarajan and Rajappa with the knowledge that they had formed Intellisee.
9. At the January 21, 2012 meeting, Govindarajan agreed with the other directors and shareholders of Novedea to work together to dissolve Novedea, or for Govindarajan to sell his shares to Novedea to the other shareholders, or for us to sell Novedea to a third party. The directors and shareholders agreed to meet again on February 11, 2012 to take action regarding one of the three options.
10. On January 24, 2012, I learned that Govindarajan had the exterior lock to the entrance to Novedea changed without notice to anyone else at Novedea, and that only Govindarajan has a key to the new lock. This action by Govindarajan makes it impossible for employees to enter the offices of Novedea and perform their jobs.
11. Novedea maintains two bank accounts. Bank of America account number [REDACTED] 4621 contains approximately \$100,000. First Financial Bank of Texas account number [REDACTED] 6326 holds approximately \$150,000. Only I and Govindarajan know the passwords to the accounts.
12. On January 24, 2012, I learned that Govindarajan changed the passwords to our two bank accounts. Because of this, Noveda currently cannot carry out essential corporate functions, such as issuing payroll checks (which, bi-monthly, exceed \$50,000), processing accounts receivable, or issuing checks for accounts payable.”

FURTHER AFFIANT SAYETH NAUGHT.

EXECUTED ON the _____ day of _____, 201____.

Ramdhan Yadav Kotamaraja

SUBSCRIBED AND SWORN TO BEFORE ME ON the _____ day of _____, 201____.

Notary in and for the State of
Massachusetts